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May 25, 1993

Mr. Steve C. Tribble  
Director, Division of Records and Reporting  
Florida Public Service Commission  
101 East Gaines Street  
Tallahassee, Florida 32301

RE: Docket No. 920260-TL

Dear Mr. Tribble:

Enclosed are an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Request for Confidential Classification. Please file this document in the above-captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served on the parties shown on the attached Certificate of Service.

Sincerely,

*Nancy B. White*  
Nancy B. White (D)

Enclosures

cc: All Parties of Record  
A. M. Lombardo  
H. R. Anthony  
R. D. Lackey

*Jen*

DOCUMENT NUMBER-DATE

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FLORIDA RECORDS/REPORTING

**CERTIFICATE OF SERVICE**

**Docket No. 920260-TL**

**Docket No. 900960-TL**

**Docket No. 910163-TL**

**Docket No. 910727-TL**

I HEREBY CERTIFY that a copy of the foregoing has been  
furnished by United States Mail this 25th day of May, 1993 to:

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Nancy B. White      n2

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of )  
the Revenue Requirements and Rate ) Docket No. 920260-TL  
Stabilization Plan of Southern )  
Bell Telephone and Telegraph ) Filed: May 25, 1993  
Company (Formerly FPSC Docket )  
Number 880069-TL) )  
\_\_\_\_\_)

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S  
REQUEST FOR CONFIDENTIAL CLASSIFICATION

COMES NOW BellSouth Telecommunications, Inc., d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell" or "Company"), pursuant to Rule 25-22.006, Florida Administrative Division Code, and files its Request for Confidential Classification for the Company's Response to Item Nos. 428 and 429 of Staff's Sixteenth Set of Interrogatories dated November 25, 1992.

1. Southern Bell is filing its Request for Confidential Classification for its Response to Interrogatory Item Nos. 428 and 429 because it deems the information requested to be confidential and proprietary business information in that it reflects traffic patterns of intraLATA toll services. Since competitors who offer intraLATA toll services can use this information as a resource, disclosure of this information would impair Southern Bell's ability to compete.

2. Southern Bell has appended to this Request for Confidential Classification as Attachment A a listing showing the location in the Interrogatory responses of the information designated by Southern Bell as confidential.

3. Appended hereto in an envelope designated as Attachment B is one copy of the diskette of the Interrogatory responses with the confidential information deleted.

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FPSC RECORDS/REGISTRATION

4. Attached as Attachment C is a sealed envelope containing one copy of the diskette of the Interrogatory responses with the material which is confidential and proprietary. Copies of Attachment C are not being served on the other parties in this proceeding.

5. Regarding Southern Bell's Response to Interrogatory Item Nos. 428 and 429, these responses are entitled to proprietary confidential classification. The data provide a blueprint of Southern Bell's route-specific the intraLATA toll usage by exchange for each LATA in Florida. It contains actual and perceived traffic demand over specific toll routes. The disclosure of this highly valuable competitive toll market information would impair Southern Bell's ability to compete in the intraLATA toll market. Competitors could use the information to target the most lucrative routes. Section 364.183(e), Florida Statutes, expressly considers as proprietary confidential business information any information relating to competitive interests, the disclosure of which would impair the competitive business of the provider. The information contained in Southern Bell's Response to Interrogatory Item Nos. 428 and 429, as more specifically described above, meets the statutory criteria, and should therefore be afforded confidential classification.

6. Southern Bell has treated and intends to continue to treat the material for which confidential classification is sought as private, and this information has not been generally disclosed.

WHEREFORE, based on the foregoing, Southern Bell moves the Prehearing Officer to enter an order declaring the information

described above and contained in the indicated portions of the attachments to be confidential proprietary business information, and thus not subject to public disclosure.

Respectfully submitted this 24th day of May, 1993.

SOUTHERN BELL TELEPHONE  
AND TELEGRAPH COMPANY

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ATTACHMENT "A"

FPSC DOCKET 920260-TL  
STAFF'S 16TH SET OF INTERROGATORIES  
DISKETTES RESPONSIVE TO ITEMS 428 & 429  
REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXPLANATION FOR PROPRIETARY INFORMATION

The information contained on the accompanying diskettes contains business information regarding Southern Bell's competitive intraLATA toll markets in Florida. As such, Southern Bell is requesting that the Commission treat the intraLATA traffic material identified below as confidential business information. This data basically provide a blueprint of the intraLATA toll usage by exchange for each LATA in Florida and is indicative of actual and perceived traffic demand over various specific toll routes. The disclosure of such traffic patterns to the public would make available to Southern Bell's competitors highly valuable competitive information which could be used to target the most lucrative routes, and therefore, such information should be classified pursuant to Section 364.183, Florida Statutes, and is exempt from the Open Records Act.

LOCATION OF THE PROPRIETARY INFORMATION

The data within each LOTUS file found on all lines of the following columns, as identified by column header, is considered by Southern Bell to be proprietary:

COLUMN HEADER

1991 (and 1992) MONTHLY NON-COIN MESSAGE  
1991 (and 1992) EST. TOTAL MONTHLY MESSAGES  
1991 (and 1992) EST. BILLABLE MONTHLY MINUTES  
CIF  
1991 (and 1992) EST. NON-DISCOUNTED REVENUE PER NON-COIN MSG.  
1991 (and 1992) EST. REV/MESSAGE (ADJUSTED FOR COIN & OCP)  
1991 (and 1992) EST. ANNUAL TOLL REVENUE  
ESTIMATED ANNUAL ACCESS CHARGES PAID  
ESTIMATED ACCESS REV. RECEIVED (REVERSE DIR)

ATTACHMENT "B"

One copy of the diskette with the confidential information deleted.

ATTACHMENT "C"

One copy of the diskette with the material which is confidential and proprietary.